



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

July 7, 2015

Wallace F. Keck  
Superintendent  
City of Rocks National Monument  
P.O. Box 169  
Almo, Idaho 83312

Dear Mr. Keck:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the draft General Management Plan/Environmental Impact Statement (GMP/DEIS) for the City of Rocks National Reserve (EPA Project Number: 09-049-NPS) in Cassia County, Idaho.

The draft GMP/DEIS analyzes potential environmental impacts associated with proposed management actions to improve protection of natural and cultural resources and visitor experience within the City of Rocks National Reserve. The new GMP would update the 1996 comprehensive management plan for the Reserve and serve as a guide for its future management in the next 15-20 years. The Reserve comprises an area of 14,407 acres, of which about 9,680 acres and 640 acres are in federal and state ownership, respectively, and the remainder (4,087 acres) is privately owned. The area includes unique and diverse resources and features, such as the California National Historic Trail, Salt Lake Alternate, and more than 350 early emigrant signatures on 22 rocks that attract a variety of visitors to the Reserve for rock climbing, hunting, hiking, biking, horseback riding, birding, and research experiences. There are also diverse plant communities (sagebrush steppe, pinyon-juniper, and mountain woodlands and forests) and wildlife species in the Reserve, including the Idaho's only known population of cliff chipmunk. Unlike most other national park units, grazing and hunting occur within the Reserve.

For the proposed GMP/DEIS's potential impacts analysis, the National Park Service (NPS) considered four alternative actions (A-D), including a No Action. Alternative B (*Silent City of Rocks*), the identified preferred alternative, would focus on spectacular scenic resources, geology, biological richness, and cultural landscape experienced by emigrants and early settlers as well as contemporary visitors. Alternative B would also prioritize resource protection from impacts due to management activities through reduced livestock grazing over time, enhanced public participation in education and interpretation programming, improved visitor facilities and outreach, and implementation of climate change mitigation, research, and interpretation strategies. The primary distinguishing features among Alternatives are related to whether grazing on the Reserve should be continued or not, and if the current Reserve boundary should be modified. Otherwise, all other management activities appear to be the same for all action alternatives, differing only in intensity, where undertaken (management zones), and approaches applied to achieve desired resource conditions based on data about the Reserve's resources and visitor use.

The EPA recognizes the challenges of managing resources on lands involving a mix of ownership, especially when addressing multiple statutory requirements to protect resources and restore the environment. Thus, we commend NPS for efforts in putting together the proposed GMP/EIS, which can serve as a guide for future development of individual plans and projects. We also note with appreciation that the GMP/EIS includes responses to public comments and that identification of planning criteria, significant issues, and alternative actions addressed in the GMP/EIS considered inputs received from the public. The document also addresses many of the issues we raised during the scoping period in November 2009, including climate change effects and cumulative impacts.

Overall, the draft GMP/EIS includes a good description of resources within the project area, analysis of anticipated environmental impacts, measures to offset the impacts, and monitoring to ensure desired resource conditions are achieved and maintained. Because of its general nature, however, the GMP/EIS should make it clear that there will be separate NEPA analysis for individual land use and resource management plans and projects tiered to this GMP/EIS, such as transportation and livestock grazing plans or construction of new camp sites, trails, and visitor facilities. The draft GMP/EIS indicates, for example, that results from a NPS study showed transportation was the largest contributor to total greenhouse gas emissions for the Reserve, accounting for up to 75% of emissions (p. 205). Overgrazing on the Reserve has also altered many of the riparian areas, causing accelerated soil erosion and elimination of typical riparian plant species e.g., willows and mountain alder (p. 230). Additionally, grazing has continued to have adverse effects on other resources including water quantity, wildlife and wetlands (p. 166).

Based on our review, we have identified some concerns regarding impacts to water quality and air quality. Therefore, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

### **Water Quality Impacts**

The draft GMP/DEIS indicates that a number of springs found in the Reserve are used for grazing. Although water quantity and quality of the Reserve streams and springs have not been extensively studied (p. 223), results from one monitoring study conducted in 2009 indicated that turbidity and dissolved oxygen exceeded general state regulatory thresholds for those parameters in the North Fork, South Fork, and main stem of Circle Creek. The GMP/DEIS further indicates that water quality may be impacted because most of the soils in the Reserve are highly erodible, and several severely eroded areas contribute sediment to streams during high flow caused by storm events and spring snowmelt (p. 224). Moreover, high stream sediment and associated turbidity can negatively affect downstream aquatic organisms both in and outside the Reserve. Livestock use in riparian zones increase localized soil erosion and add fecal coliform to streams and springs. The planning area also includes many small wetlands, typically in riparian areas next to streams and springs, and other seasonally wet areas that function as small oases that support wildlife, insects, and plants that might not thrive elsewhere in the Reserve.

Although some riparian areas in the project area will be restored, we are concerned about sites where continued livestock grazing is likely to further degrade streams through increased entrenchment due to streambank scouring, erosion, poor drainage and loss of soil and riparian vegetation. Degraded streams have the potential to contribute significant sediment bedloads to the system, thus slowing the rate of water quality and stream health recovery. Thus, we believe that additional protection of certain riparian areas is warranted, especially where a significant number of stream/creeks are poorly functioning and

are near high quality habitat(s), drinking water sources, and other sensitive resources. In such cases, we recommend that grazing exclusions be considered to move existing resource conditions toward desired future conditions more rapidly. Active restoration should also target such areas to increase vegetation cover and improve thermal conditions of the stream channels.

We recommend that Proper Functioning Condition assessments and rangeland health assessments be completed for the planning area, and that grazing management plans align with the goals and conclusions of those assessments. We also recommend that the final GMP/EIS identify added precautions for grazing or other activities near vulnerable streams and their drainages to reduce or avoid impacts to water quality, especially in areas that are functioning at high risk or are already impaired.

The draft GMP/EIS states that the majority of the soils in the Reserve are highly erodible and that water erosion hazards are particularly severe for most mountainside soils and moderate for even the gentler sloping alluvial soils; and that wind erosion hazard is moderate in some areas, especially where there are finer textured soils (p. 216). As a result, soil erosion has occurred near roads on steep slopes and stream channels such as tributaries to Circle and Emigrant creeks. Erosion in those areas has also formed deep gullies and some of the exposed soil banks are more than 8 ft. high. In heavily grazed areas, most of the protective vegetative ground cover is lacking and soil is exposed to potential erosion by water and wind. As the Reserve is mostly arid, low precipitation leaves the soils more vulnerable to management actions and there is need to take action to reduce erosion. Specifically, construction and grazing activities may increase the potential for erosion and sedimentation that can adversely impact water quality.

Given the susceptibility of soils to erosion and predicted increases in access for recreation and use of recreational equipment, we are concerned that ground disturbing activities such as blasting, surface grading, excavation, surface pavement, and travel could adversely affect water quality. Such activity can alter hydrology of springs and surface runoff, allowing erosion to carry sediment and pollutants to waterways in the planning area. In addition, such activities can accelerate infiltration and migration of pollutants through soils to the underlying aquifer thereby affecting groundwater quality and eventually surface water quality. Further, groundwater extraction, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality. We recommend monitoring and precautionary actions to avoid such impacts.

We realize that, due to the fragmented ownership of the lands in the planning area, it is necessary to coordinate and work collaboratively with other public and private landowners to manage aquatic resources and improve water quality. We recognize the value of NPS's engagement with the community and encourage continued engagement with local watershed councils and advisory groups in evaluating aquatic resources conditions, and monitoring so corrective actions may be taken to meet environmental goals.

Since the construction of new visitor and administrative facilities, and associated parking lots will potentially disturb 5 or more acres (p. 316), a National Pollutant Discharge Elimination System (NPDES) permit from the EPA will be required. The final GMP/EIS should include updated information on the permit application process and measures to protect water quality.

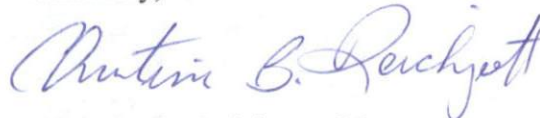
### **Air Quality Impacts**

The GMP/DEIS describes current air quality conditions in the project area and indicates that the project is within an area that meets all criteria air pollutants (p. 202). Even though background concentrations of criteria pollutants within the project area and vicinity are currently within standards, there is potential for significant air emissions from the project due to fugitive dust releases during ground disturbing activities and cumulative impacts from surrounding activities such as road construction, regular traffic on dirt roads, emissions from vehicles using local roads, agriculture, and fire.

In recognition of expected traffic increases to and from the Reserve, and that some visitors may be sensitive to air quality conditions, we recommend consideration of installing air monitoring equipment in high use areas. The GMP/DEIS indicates that the Reserve does not have onsite air quality monitoring equipment and that NPS interpolates pollutant monitoring data from the national networks to estimate air quality conditions in the Reserve. Accurate local information would better inform air management at the Reserve. We also note that areas near the Reserve were previously designated as nonattainment for fine particulates and other pollutants or are sources of significant emissions (p. 326). Therefore, we would recommend maximum implementation of mitigation measures described in the GMP/DEIS to reduce emissions associated with activities under the proposed project, and continue to coordinate with other entities in the area, especially IDEQ, to protect Reserve visitors and staff, and to assure that the project will meet air quality standards throughout the GMP lifespan.

Thank you for the opportunity to review this GMP/DEIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements